

## ENVIRONMENTAL RESEARCH & TECHNOLOGY, INC.

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REF: AQSD-14

ERT Doc. No. P-4155

4 January 1979

CEIVE

Mr. John McGuire Regional Administrator U.S. EPA Region V 230 S. Dearborn Street Chicago, IL 60604

AN 0 8 1979

EPA REGION 5

Dear Mr. McGuire:

Catepillar Tractor Company (Caterpillar) operates a manufacturing plant in Joliet, Illinois. Heat for this complex is provided by four industrial boilers. Two boilers are fired with natural gas and two are fired with coal. These boilers have been operating since 1951 and continue to operate under a State of Illinois operating permit.

Caterpillar is developing plans to convert the two natural gas fired boilers back to coal. Both these boilers were originally built to burn coal; they were converted from coal to gas in 1971.

Because the boilers were originally built to accommodate the burning of coal prior to January 6, 1975, Caterpillar has concluded that a new source review under either the Prevention of Significant Deterioration (PSD) rules of June 19, 1978 or the draft Emission Offset Interpretive Ruling (August, 1978) is not required. Such an exemption is allowed under 40 CFR 52.21 paragraph (b)(2)(ii)(d)(43 FR 26404) of the PSD rules, and Section II A.5.(ii)(d) of the Offset Ruling.

Catepillar is required to apply for an operating permit from the State of Illinois and will be doing so in the near future. As part of that permit they will be required to meet emissions limitations of 0.1  $1b/10^6\,\mathrm{Btu}$  for particulate matter and 1.8  $1b/10^6\,\mathrm{Btu}$  for sulfur dioxide.

Caterpillar would like to proceed with this project as soon as possible and therefore requests that your office reply to this letter, with your comments, at your earliest convenience.

Thank you very much for your time and cooperation. We look forward to hearing from your office.

Sincerely,

Robert V. Hatcher Senior Meteorologist

for

Caterpillar Tractor Co.

/jem

cc: K. Below, Caterpillar Tractor Co.